# **EXHIBIT A**

### **Expertise**

#### IC Design

- EDA Software
- Digital circuit design and simulation
- Analog IC design and analysis
- Analog circuit design
- RF and microwave circuit design

#### **Source Code**

- Identification of copied source code
- Analysis of copied source code
- Analysis of alleged trade secret misappropriation
- Patent infringement of source code
- Copyright infringement of source code, including database schemas

#### **Contact Information:**

Brass Rat Group, Inc. 2225 E. Bayshore Rd, Suite 200 Palo Alto, CA 94303 www.brassratgroup.com mwalker@brassratgroup.com 650-331-0200

#### Litigation Experience

Dr. Walker has testified in jury trials and arbitration involving software technology issues, including testifying in federal court and the ITC on matters relating to infringement and validity of various patents as well as misappropriation of trade secrets. He has been engaged as a "technology neutral" to assist in the resolution and adjudication of electronic discovery issues. Dr. Walker is particularly adept at explaining complex technology issues to lay audiences and, as such, has often been asked to present Markman tutorials and prepare demonstratives for arguments as well as his testimony. He regularly works with attorneys to help articulate and manage the many technology issues that arise in complex litigation.

### **Industry Experience**

Dr. Walker is a recognized expert with over 40-years of experience in design of integrated circuits, including analog, digital and RF/microwave circuits. His analog IC circuit design experience includes analog components such as PLLs, voltage regulators/controllers and linear systems. In the digital IC design Dr. Walker has experience at the circuit level, including such structures as ESD components, level shifters, sense amps, SDRAM circuits such as DDR sequencing circuits and On-Die Termination (ODT). His RF/Microwave design experience includes microwave components (such as amplifiers, oscillators, mixers and switches) as well as sub-systems (tuners, low-noise down converters, etc).

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Dr. Walker has over 25 years experience in electronic design automation (EDA) software systems, simulation and circuit design and modeling. He is a recognized expert in the field of EDA systems, simulation, and modeling. He also has experience with the design of digital and analog IC, with verilog and VHDL analysis, synthesis of digital ICs such as flash memory controllers, analyses and verification of metal interconnects and related process technology.

During his consulting career, Dr. Walker has gained experience with smart-phone applications and system-level programming and integration with underlying hardware. For example, he has analyzed operation of Android and iOS systems to determine their functionality and analyze whether the functionality meets the claim limitations of cellular technology patents. For example, he has analyzed WiFi and cellular data communications, including the interfaces between the handset operating system and the WiFi and cellular chip sets.

Additionally, Dr. Walker has analyzed the operation of cellular modems, including hardware, firmware, and software to determine the operation of the modems as they related to various 3GPP, CDMA2000, and LTE cellular communication standards.

During the course of his practice, Dr. Walker has analyzed such diverse code as EDA software, VoIP software, database schema, mail-list processing software, speech-recognition systems and stock-brokerage software. He is familiar with a wide variety of source-code repositories including CVS, RCS, Subversion, Perforce, and Rational ClearCase.

Dr. Walker has also performed numerous analyses of systems-on-a-chip. The operation of such ICs is often defined by a combination of hardware and software. The hardware is usually specified at the RTL level in Verilog or VHDL. This hardware is often controlled by software running on an embedded processor, such as an ARM. He has been asked to understand, analyze, and document the operation of the system in the context of patent infringement or (in the case of potential prior art) invalidity. For example, he has investigated implementation of signal processing algorithms that implement 3GPP cellular telephone standards on baseband modem ICs.

#### **Litigation Projects**

Matter Sequence Design vs various defendants

Description Patent infringement – pre-litigation investigation (EDA Software)

Law Firm Thelen Reid
Client Sequence Design

Status Settled Dates 2000-02

Matter Silvaco v CSI

Description Misappropriation of Trade Secrets; source code analysis (EDA

Software)

Law Firm Dechert, LLP

Client Silvaco Status Settled Dates 2001-03

Testimony Multiple depositions; Testified at arbitration; Testified at trial

Matter IRS v Taxpayer

Description Analysis for tax purposes of EDA software valuation and associated

royalty streams. Provided expert report.

Law Firm FTI Teklicon (for IRS)

Client IRS

Status Completed Dates 2001-02

Matter Synopsys vs Nassda

Description Patent infringement; misappropriation of trade secrets (EDA

Software). Provided expert report and declarations. Analyzed

evidence of electronic document spoliation.

Law Firm Dechert LLP
Client Synopsys
Status Settled
Dates 2001-04
Testimony Deposition

Matter Aprés v Ho

Description Misappropriation of trade secrets related to EDA software Law Firm Law offices of Al Reynaldo (for cross-defendant Aprés)

Client Aprés
Status Settled
Dates 2003
Testimony Trial

Matter HCL vs eKomas

Description Analysis and identification of directly copied source code written in a

web-host scripting language. The product at issue is a web-based

application for loan management.

Law Firm Dechert
Client HCL
Status Settled
Dates 2003-04

Matter Tera Systems vs InTime Software

Description Patent infringement related to EDA software. Researched invalidity

and supported claim construction.

Law Firm McDermott
Client InTime Software

Status Settled Dates 2004

Matter Siliconix vs AATI

Description Patent infringement regarding method for manufacturing a

semiconductor device. Support for claim construction and invalidity

analysis. Researched prior art.

Law Firm Dechert LLP

Client AATI
Status Settled
Dates 2004-05

Matter Berry vs Fleming, et al.

Description Source code copyright and misappropriation of trade secrets of an SQL

database schema as well as associated source code. Reviewed source code at issue. Provided expert report relating to software development, non-infringement of copyright, and analysis of forensic data to refute

claims of electronic evidence spoliation.

Law Firm Kirkland

Client Flemming and other Defendants

Status Completed - Summary judgment of non-infringement of copyright for

more than 90% of potential damages. Jury verdict awarding minimal

damages for balance of claims.

Dates 2005

Matter Synopsys vs Magma

Description Theft of IP relating to EDA software as well as patent infringement in

two venues. Analyzed Magma software written mostly in C++ for infringement identified historical software supporting invalidity of Magma patents. Provided support for claim construction and

invalidity analysis.

Law Firm Dechert/Wilson Sonsini

Client Synopsys

Status Settled. Dates 2005

Matter Keywords vs ISE

Description Investigated allegations of source code copying and copyright

infringement of source code written in an interpreted language similar

to perl. Declaration ISO of opposition to preliminary injunction.

Client ISE Status Settled. Dates 2005

Matter Experian v. I-Centrix

Description Investigating allegations of source code copying and misappropriation

of trade secrets. The code was originally written in Fortran, but then translated into the C programming language. Performed analysis of electronic data that suggested evidence tampering on the part of defendants. Expert Report documenting identification of literal copying of source code as well as copied algorithms. Also identified methods the defendants used in an attempt to disguise the

misappropriated code and algorithms.

Law FirmJones DayClientExperianStatusSettled.Dates2005-06TestimonyDeposition

Matter FIS v. CalAmp

Description Investigation of alleged misappropriation of trade secrets. Performed

investigation and created expert report regarding the alleged

misappropriation.

Law Firm Gordon Rees
Client CalAmp
Status Settled.
Dates 2006

Matter LiveOps v. Teleo

Description Misappropriation of trade secrets, copyright infringement of VoIP

software systems. Investigation to detect software copying.

Law FirmGordon ReesClientLiveOpsStatusSettled.Dates2006

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Matter Matsushita v. MediaTek

Description Patent infringement investigations (invalidity, claim construction,

infringement) relating to various patents, including design techniques and DFM technology. Provided expert report regarding infringement and validity of the patents at issue. Expert report on infringement and validity of DFM patent related to processing of metallization structures

Law Firm Dewey Ballantine

Client Matsushita Status Settled. Dates 2006

Testimony Markman Tutorial and Deposition

Matter Apple Resellers et al v. Apple Computer

Description Technology neutral appointed by Judge Jacobs May in Superior Court

of Santa Clara to resolve the parties disputes regarding proper production of electronic documents. Presentation to the Court to explain the technology and issues relating to the electronic production

by the various parties.

Status Settled. Dates 2006

Matter iSmart International v I-Docsecure

Description Plaintiffs allege that Defendants misrepresented certain technology in

the context of an equity investment. Investigated to determine facts; provided declaration regarding business practices and lack of factual basis for claims. Source code at issue was written in a web-host

scripting language.

Law Firm Paul Hastings
Client I-Docsecure
Status Settled.
Dates 2006

Matter Microsoft vs BWT Industry Technology

Description Provided expert opinion regarding alleged pirating of Microsoft

products.

Law Firm Gordon Rees

Client BWT Industry Technology

Status Settled.
Dates 2006

Matter Benedict v Mediatrac

Description Expert testimony at a jury trial regarding standard level of care relating

to IT practices.

Law Firm Greenan, Peffer

Client Mediatrac

Status Jury award for Defendant.

Dates 2006

Testimony Deposition and Trial

Matter ST vs SanDisk

Description Patent infringement regarding semiconductor design techniques and

ESD circuits. Investigation in support of claim construction and non-

infringement analysis.

Law Firm Jones Day
Client Mediatrac
Status Settled
Dates 2006

Matter Matsushita v. MediaTek

Description Patent infringement investigations (validity, claim construction,

infringement) relating to various patents, including phase-lock loop

design.

Law Firm McDermott Will & Emery

Client Matsushita
Status Settled
Dates 2006-07

Matter Silvaco vs BindKey, et al

Description Analysis and declarations regarding misappropriation of Silvaco trade

secrets, including forensic analysis of hard disk drives used by

defendants. The source code was written in C++.

Law FirmDeschertClientSilvacoStatusSettledDates2006

Matter Shore Venture Group v Authentidate

Description Source code analysis.
Law Firm Buchanan Ingersol
Client Shore Venture Group

Status Settled Dates 2007

Matter Panpacifics v Tradebeam

Description Selected as an independent expert to assist the arbitration panel with

technology issues

Status Settled Dates 2007

Matter Shareholders v Magma

Description Documented facts relating to the technical aspects of false and

misleading statements made by Magma. Provided technical consulting service to plaintiffs counsel to explain the scope and nature of the Defendants acts. Expert report addressed industry-standard software coding practices and level of care relating to possible misappropriation of trade secrets by employees, misappropriation of

trade secrets

Law Firm Millberg Weiss
Client Shareholders
Status Settled
Dates 2007

Matter BHE Group v MTS Products

Description Analysis of expert testimony; investigation relating to performance of

computers

Law Firm Miller Barondess Client BHE Group

Status Closed. Jury award in excess of \$45,000,000 for client, BHE

Dates 2007

Testimony Deposition; Jury trial

Matter HP v Acer

Description Retained as testifying expert. Analyzed ICs regarding infringement of

Acer's circuit design patents. Analyzed and documented infringement of several different ICs. Research included on-site inspections of IC designs using owner-supplied design tools to demonstrate

infringement.

Law FirmDechertClientAcerStatusSettledDates2007

Matter Variphy, Inc. et al, v Clarus Systems, Inc.

Description Investigate alleged misappropriation of trade secrets and source code

copying of VoIP telephony and related applications.

Law Firm Bergeson, LLP

Client Clarus Status Settled Dates 2008

Matter Sandisk v various Flash memory manufacturers

Description Retained as consulting expert responsible for analyzing flash memory

controller products for possible infringement of SanDisk patents. Analyzed the detailed design of various products and prepared infringement analyses. Support depositions of technical personnel and

experts.

Law Firm Wilson Sonsini

Client Sandisk Status Closed Dates 2008

Matter Web.com v Go Daddy

Description Prepared and presented claim construction tutorial explaining the

background technology for 4 web-hosting related patents

Law Firm Wilson Sonsini

Client Sandisk Status Closed Dates 2008

Testimony Markman tutorial explaining technology for the web-hosting patents

at issue.

Matter On Semiconductor v Samsung

Description Retained as testifying expert. Performed research to determine

infringement and validity of four patents. Three of the patents related to circuits; one related to metallization systems. Prepared expert reports regarding infringement and validity. Prepared declarations in support of various discovery motions. Prepared Markman tutorial for all patents at issue. Assisted attorneys in deposition of Samsung's

expert and other technology witnesses.

Law Firm Jones Day

Client On Semiconductor

Status Settled
Dates 2007-08
Testimony Deposition

Matter Ricoh v Synopsys

Description Consulting expert. Prepared technology tutorial. Researched and

assisted in preparation of a Motion for Summary Judgment for non-

infringement and reply.

Law Firm Wilson Sonsini Client Synopsys

Status Summary Judgment in favor of Synopsys

Dates 2008-09

Matter Spansion v Samsung (ITC and District Court actions)

Description Consulting expert. Provide analysis and discovery advice on evidence

needed to demonstrate infringement of the patents at issue.

Law Firm King and Spalding

Client Spansion Status Closed Dates 2009

Matter Toshiba Medical v. Stubitsch

Description Testifying expert. Provided expert report and declarations relating to

the sufficiency of Toshiba trade secrets descriptions and their misappropriation. Analyzed and responded to motions regarding the

particularization of the trade secrets.

Law Firm Ford Marrin Esposito
Client Toshiba Medical

Status Closed Dates 2009

Matter Data Treasury v Wells Fargo, et al

Description Testifying expert. Provided expert report relating to non-infringement

of patents by Bancorp South in this extensive litigation in Eastern District of Texas. Reviewed documents and plaintiff expert reports. Developed and documented several bases for non-infringement.

Law Firm Andrews Kurth

Client Defendant Bancop South

Status Closed Dates 2009

Matter LSI Logic/Agere vs Xilinx, Inc

Description Consulting expert responsible for four patents relating to design

software and logic circuits. Prepared Non-infringement

analyses/invalidity analyses. Examined circuits as possible prior art

Law FirmJones DayClientXilinxStatusClosedDates2009-10

Matter On Semi v Hynix, Elpida, and Nanya

Description Retained as testifying expert. Performed research to determine

infringement and validity of five patents. Four of the patents related to circuits; one related to methods of programming flash memory

systems.

Law Firm Perkins-Coie
Client On Semi
Status Closed
Dates 2009-10

Matter Red Bend Software v Google

Description Testifying expert. Analyzed part of the Chrome browser software

accused by Red Bend of infringing a Red Bend patent. Analyzed Red Bend infringement contentions and the browser component at issue. Prepared expert declaration supporting Google's opposition to motion for preliminary injunction. Supported attorneys in preparing

oral arguments for Summary Judgment hearing.

Law Firm Bingham McCutchin

Client Google

Status Concluded. Summary judgment in favor of Google

Dates 2009 Testimony Deposition

Matter 2kDirect v. Azoogle Ads

Description Testifying expert. Researched issues relating to proper practice by

companies engaged in technology due diligence. Provided expert

report documenting my opinions.

Law Firm Cotchett, Pitre & McCarthy

Client 2kDirect
Status Closed
Dates 2010
Testimony Deposition

Matter Scratch DJ LLC v Activision Publishing

Description Identify source code implementing the asserted trade secrets.

Determine if and to what extent defendant used misappropriated source code. Project involved code comparison between code bases

in the presence of considerable third party source code.

Law Firm Duffy Sweeney
Client Scratch DJ LLC

Status Closed Dates 2010

Matter Volterra v Primarion

Description Testifying expert for matters relating to the validity or certain

Volterra patents. The patents describe integrated semiconductor power switches and their implementation in silicon. My task

involved review of the implementation of the devices and the efforts to copy those devices by the defendants. I provided an expert report

and testified at deposition.

Law Firm Farella Brown

Client Volterra
Status Closed
Dates 2010
Testimony Deposition

Matter Panasonic v Freescale

Description Testifying expert in the ITC matter. Review the asserted claims of

the patent at issue. Determined if the claims were infringed by certain of the Defendant's designs. Provided expert report relating to claim construction and infringement. Testified at deposition. The patent relates to IC design and manufacturing in general, and more particularly to the patterns of metal interconnects on the designs.

Law Firm White Case
Client Panasonic
Status Closed
Dates 2010
Testimony Deposition

Matter Nuance v Vlingo

Description Testifying expert regarding infringement and validity of speech

recognition methods and devices. Analyzed source code and documented evidence of infringement. Considered alleged prior art and identified missing elements. The accused products are webbased speech to text software systems written in C++ and Java programming languages. Authored expert reports concerning

infringement and validity.

Law Firm Irell Manella
Client Nuance
Status Closed

Dates 2011

Testimony Deposition and jury trial testimony regarding infringement and

validity. Judge Zobel encouraged the jury to pose questions directly

to me, which they did on several occasions.

Matter Rambus v Freescale, et al

Description Investigation relating to DDR2 memory interface and high speed

serial interfaces, and possible defenses as well as documenting substantial non-infringing use. Created expert report documenting

findings.

Law Firm K&L Gates

Client ST Microelectronics

Status Closed Dates 2011

Testimony Deposition.

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Matter Freescale v. ChipMos

Description Testifying expert regarding scope of licensed patents relating to a

defense of patent exhaustion. Compared the scope of patent licenses

granted in two contracts. Drafted expert report.

Law FirmJones DayClientFreescaleStatusClosedDates2011

Testimony Deposition.

Matter Richtek v uPI

Description Testifying expert regarding use of misappropriated trade secrets and

elements of certain third party graphics board designs in an ITC enforcement action. Conducted an investigation relating to the

Respondent's continued use of Richtek intellectual property. Drafted two expert reports and witness statements. Testified at the hearing.

Law Firm Alston Bird
Client Richtek
Status Closed
Dates 2011

Testimony ITC Hearing and Deposition.

Matter Brown v TPL

Description Testifying expert relating to misappropriation of trade secrets

asserted by TPL against Brown. Investigated nature of the trade secrets and whether Brown had identified protectable trade secrets as well as evidence of misappropriation of the trade secrets. Testified at

the jury trial.

Law Firm GCA Law Client Brown

Status Jury award for client Brown

Dates 2011-12

Testimony Jury Trial and Deposition

Matter Samsung v Apple

Description Testifying expert relating to operation of baseband modem ICs that

implement the 3GPP standard. Investigated hardware and firmware

source code written in VHDL, Verilog, and C languages. Determined the signal coding and decoding in various ICs as compared operation to Samsung's alleged "standard-essential"

patents. Drafted expert report.

Law Firm Wilmer Hale

Client Apple
Status Closed
Dates 2012
Testimony Deposition

Matter I-V vs Hynix

Description Testifying expert on infringement and validity of patents relating to

design of certain DDR3 memory products. Investigation included analysis of circuit schematics for DDR3 memories. Provided expert

reports supporting validity and infringement

Law Firm Weil Gotshal

Client Intellectual Ventures

Status Closed
Dates 2011-12
Testimony Deposition

Matter SST Corp. v. eSilicon Corp

Description Testifying expert on matters relating to misappropriation of IC design

trade secrets and standard industry practices regarding licensing of

silicon IP. Provided expert report.

Law Firm Fenwick
Client eSilicon
Status Closed
Dates 2012
Testimony Deposition

Matter InterDigital v (Cell phone suppliers including Huawei and ZTE)

Description Testifying expert relating to the operation of certain Android cell

phones and the operation of the baseband modem ICs. Investigation including analysis of Android source code as well as the source code

and HDL of the baseband modem. Provided expert reports

Law Firm Wilson Sonsini
Client InterDigital
Status Closed
Dates 2012-13

Testimony ITC Hearing; Deposition.

Matter Dynetix v Synopsys

Description Testifying expert on infringement of patents related to simulation of

integrated circuits. Investigation included analysis simulator source

code. Provided expert report.

Law FirmOrrickClientSynopsysStatusClosedDates2012TestimonyDeposition.

Matter AMCC v Sandforce, LSI Logic et al

Description Testifying expert the process of IC design, particularly as it relates to

the design of processors.

Law FirmGibson DunnClientAMCCStatusClosedDates2013TestimonyDeposition

Matter Skyhook v Google

Description Research the operation of handset location determination systems.

Compared the operation to various patent claims for the purposes of determining infringement as well as whether certain prior-art systems meet the claim limitations. Provided expert reports relating to non-

infringement and inventorship.

Law Firm Steptoe and Johnson/Keker-Van Nest

Client Google
Status Closed
Dates 2011-2015
Testimony Deposition

Matter British Telecom plc v Google, Inc

Description Research regarding non-infringement of two mobile data related

patents and the operation of Google servers as well as components of

the Android OS. Prepared expert reports relating to non-

infringement by Google.

Law FirmWhite CaseClientGoogleStatusClosedDates2012-2014TestimonyDeposition

Matter Mortgage Grader v Costco

Description Patent infringement. Analyzed operation of web-based application

relating to anonymous pricing of mortgages. Created expert report

describing the multi-tiered application.

Law Firm TechKnowledge Law Group

Client Mortgage Grader

Status Closed
Dates 2014
Testimony Deposition

Matter Norman IP v Lexmark et al

Description Patent Infringement relating to processor architecture of controllers

used in communication modules used in the MBZ products.

Researched non-infringement and invalidity.

Law Firm Sherman & Sterling

Client MBZ Status Closed

Dates 2013-14

Matter SnapOn v Bosch

Description Patent Infringement of software and hardware for wheel alignment

systems. Research related to determining infringement.

Law Firm Grippo & Elden

Client SnapOn Status Closed Dates 2012-14

Matter Monster LLC

Description Covered Business Method (CBM) review. Prepared invalidity

analysis of two patents relating to web based methods for job searching and matching. Prepared declarations in support of the

petitioner.

Law Firm Dechert
Client Monster LLC
Status Closed

Dates

Matter HSM v. Fujitsu, et al.

2014

Description Patent Infringement by Micron memory specific analog and digital

gate and transistor level circuits. Created tutorial and provided declarations in support of claim construction. Analyzed operation of accused devices. Provided expert reports supporting invalidity and

non-infringment

Law Firm Weil Gotshall

Client Micron
Status Closed
Dates 2013-2016
Testimony Deposition

Matter UnWired Planet v Apple

Description Patent infringement by Apple server and client side software relating

to speech recognition and location services.

Law Firm Gibson Dunn

Client Apple
Status Closed
Dates 2013-14

Testimony Presented Markman tutorial for all patents at issue.

Matter InterDigital v Nokia

Description Patent infringement relating to the operation of certain Android cell

phones and the operation of the baseband modem ICs. Investigation including analysis of Android source code as well as the source code

and HDL of the baseband modem.

Law Firm Wilson Sonsini/Latham

Client InterDigital
Status Closed
Dates 2013

Testimony Testified at deposition and at ITC hearing.

Matter InterDigital v Samsung

Description Patent infringement relating to the operation of certain Android cell

phones and the operation of the baseband modem ICs. Investigation including analysis of Android source code as well as the source code

and HDL of the baseband modem.

Law Firm Wilson Sonsini/Latham

Client InterDigital
Status Closed
Dates 2013

Testimony Testified at deposition.

Matter Realtek v LSI Logic

Description Patent infringement and validity relating to the physical layout and

performance of certain IC devices. Prepared expert reports and

witness statements relating to infringement and validity.

Law Firm Reed Smith
Client Realtek
Status Closed
Dates 2012-2014

Testimony Testified at deposition and at the ITC evidentiary hearing.

Matter Newell et al. v Yapstone et al.

Description Investigation of the operation of a web-based application, including

the software architecture, performance, and details of the operation.

Provided expert report.

Law Firm Valorem Law

Client Newell
Status Closed
Dates 2014-2015

Testimony Testified at deposition

Matter XimpleWare, Inc. v Versata et al

Description Investigation related to infringement of XimpleWare open source

software licensed through the GNU copyright. Expert report detailed the scope of infringement and efforts by Defendants to remove the

allegedly infringing source code.

Law Firm Valorem Law

Client Versata
Status Closed
Dates 2014-2015

Matter Oracle America, Inc. v Terix et al

Description Investigation relating to the extent of alleged copyright infringement

by the defendants relating to Sun Solaris software and firmware.

Law Firm GCA Law Client Terix/Maintech

Status Closed Dates 2015

Matter Lenovo et al v Personal Audio

Description Investigation relating to personal music player patent held by

Personal Audio. Research prior art, including source code analysis.

Prepared Declaration supporting Petitioner's IPR

Law Firm White Case
Client Google
Status Closed
Dates 2015
Testimony Deposition

Matter ATopTech v Synopsys

Description Supported Patent Owner's response to IPR review of a Synopsys

patent relating to static timing analysis. Researched and preparted

declaration in support of Patent Owner's final response.

Law FirmJones DayClientSynopsysStatusClosedDates2014-2015TestimonyDeposition

Matter Synopsys v ATopTech

Description Investigation relating to Synopsys claims of copyright infringement

relating to ATopTech's use of Synopsys commands and output formats in their tool. Documented the extent of the infringement,

prepared declarations.

Law FirmJones DayClientSynopsysStatusClosedDates2014-2016

Matter Verizon et al v Orlando Communications

Description Investigation relating to aspects of Android OS. Prepared

Declaration supporting Petitioner's request for re-exam of two

Orlando Patents. Examinations were instituted in full.

Law Firm Keker Van Nest

Client T-Mobile

Status Closed Dates 2015-2016

Matter Xilinx v McCubbrey

Description Investigation relating to design of FPGAs. Prepared Declaration

supporting Petitioner's request for re-exam of two McCubbrey

Patents.

Law Firm Haynes Boone

Xilinx Client Closed Status Dates 2015

Matter NFC Technology v Samsung Electronics Co. LTD.

Description Investigation relating aspects of NFC communications in Samsung

mobile phones. Investigated operation of devices during various

NFC communications modes.

Law Firm Finnegan

Client NFC Technologies

Status Closed Dates 2015-2016

Matter WTS Paradigm, LLC v EdgeAQ, LLC.

Description Investigation to alleged misappropriation of EdgeAQ trade secrets

> relating to window and door configuration software. Investigated and reviewed the partys' source code and software configuration management systems to determine the extent of the alleged

misappropriation

Law Firm Foley and Lardner LLP

Client EdgeAQ Status Closed Dates 2015-2016

Matter AVM v Intel

Description Confidential investigation relating to non-infringement by Intel of

> AVM patent. The asserted claims relate to transistor-level circuits inside Intel processors. I investigated the design flow, analyzed

circuits and the design tools that supported circuit design.

Law Firm Wilmer Hale

Client Intel Status Closed 2015-2018 Dates

Matter Intellectual Ventures v Ricoh Americas Corp.

Description Investigation to alleged infringement of two patents relating to design

of printer and scanner hardware. Performed prior art investigation relating to the invalidity of the IV patents. Testified at deposition.

Law FirmOrrickClientRicohStatusClosedDates2016

Matter CCE v AT&T

Description Investigation related to alleged infringement by MAC-layer LTE

communications.

Law Firm Paul Hastings

Client AT&T
Status Closed
Dates 2016-2017

Matter Raytheon v Cray.

Description Investigation as to alleged infringement of two patents related to

software based job scheduling in multiprocessor environments.

Provided expert report.

Law Firm Steptoe & Johnson

Client Raytheon
Status Closed
Dates 2016-2019
Testimony Deposition

Matter NXP v NFC Technology

Description Declaration in support of patent owner's response to IPR of a patent

relating to aspects of NFC communications in Samsung mobile

phones. Investigated claimed prior art and motivation to combine the

art with NFC communication modalities.

Law Firm Finnegan

Client NFC Technologies

Status Completed Dates 2017

Matter R2 v Intel

Description Confidential investigation relating to non-infringement by Intel of R2

patent. The asserted claims relate to circuit components inside Intel processors. I investigated the design flow, analyzed circuits and the

design tools that supported circuit design.

Law Firm Wilmer Hale

Client Intel

Status Completed

Dates 2017

Matter British Telecom v Valve, Inc

Description Investigation relating to non-infringement and invalidity of patents

asserted by BT relating to email delivery, text messages, on-line purchasing and screen sharing. Reviewed prior art and operation of

Valve's Steam online gaming platform.

Law Firm Pillsbury/Barceló Harrison

Client Valve
Status Completed
Dates 2017

Matter Apple

Description Confidential investigation related to patents reading on RF and

microwave transistor level circuits.

Law Firm Haynes Boone

Client Apple
Status Completed
Dates 2017

Matter Qualcomm v Apple

Description Investigation relating to LTE modem circuits regarding patents

asserted in an ITC investigation

Law Firm Wilmer Hale
Client Apple/Intel
Status Closed
Dates 2017-2018

Matter Attia v Google

Description Investigation relating to misappropriation of building architectural

trade secrets. Investigation involves operation of Google source code

Law Firm Wilson Sonsini

Client Google
Status On going
Dates 2017-present

Matter Compulife Software vs One Resource Group

Description Investigation and report relating to alleged misappropriation of trade

secrets and copyright infringement by third parties users of a web-

based application.

Law Firm Berger-Singerman

Client ORG
Status Complete
Dates 2017

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Matter Uchytil v Avanade et al

Description Investigation relating to alleged false claims made by Avande in

relation to a software CRM-based system. Analysis involves identification of allegedly copied source code as well as more generally the provenance of the applications source code.

Law Firm Kirkland

Client Avande/Accenture

Status Closed Dates 2017-2018

Matter GeoSolutions v GyPSii

Description Investigation relating to use of certain location related APIs

Law Firm Squire Patton Boggs

Client GeoSolutions

Status Closed Dates 2018-2019

Testimony Arbitration hearing in Beijing; Arbitration hearing in Amsterdam

Matter Red Rock Analytics v Samsung Electronics

Description Investigation relating validity of US Patent 7,346,313. The

technology relates to calibration of I-Q balance in RF transceivers

Law Firm Heim Payne & Chorush Client Red Rock Analytics

Status Closed Dates 2018-2019

Matter Unity Opto

Description Declarations in support of patent owner's response to Ex Parte re-

exams of 4 LED driver related patents

Law Firm Alston Bird Unity Opto
Status Completed Dates 2018

Matter Xilinx

Description Declaration in support of Petition for IPR of a patent related to

memory controllers in the context of reconfigurable computing

Law Firm Haynes Boone

Client Xilinx
Status Completed
Dates 2018

Matter IV vs T-Mobile, Sprint

Description Investigation related in non-infringement and invalidity of LTE

patents. Prepared declarations in support of IPR petition. Expert reports related to noninfringement and patent comparability.

Law Firm Kwun Bhansali Lazarus

Client T-Mobile, Sprint

Status Closed
Dates 2018-2019
Testimony Deposition

Matter E-Systems v Mentor

Description Investigation relating to validity and infringement of E-Systems

patent in the field of IC design software

Law Firm Burns Charest LLP

Client E-Systems
Status Closed
Dates 2018

Matter T-O Delta v 2-Wire

Description Investigation and source code analysis of DSL modem firmware

across three patent families. Analysis in support of non-

infringement.

Law Firm Goodwin Procter

Client 2-Wire
Status Closed
Dates 2018-2020

Testimony Deposition, jury trial

Matter Midwest Athletics v. Ricoh

Description Investigation related to invalidity and noninfringement of certain

printer software patents

Law Firm Jones Day
Client Ricoh
Status On going
Dates 2018-present

Matter Motorola Solutions v Hytera

Description Investigation related to source code copying, trade secret

misappropriation. Reviewed source code related to digital radio

implementations.

Law Firm Kirkland & Ellis Client Motorola Solutions

Status Closed Dates 2018-2019

Matter VLSI v Intel

Description Confidential investigation relating to non-infringement by Intel of

patents assigned to VLSI. The asserted claims relate to circuit components inside Intel processors. I investigated the design flow, analyzed circuits and the design tools that supported circuit design.

Law Firm Wilmer Hale

Client Intel

Status On going
Dates 2018-present

Matter Traxcell v Sprint

Description Investigation related in non-infringement of cellular-network patents.

Prepared expert report related to noninfringement and patent

comparability.

Law Firm McGuire Woods

Client Sprint
Status Closed
Dates 2018-2019

Matter Liion v. Vertiv

Description Investigation relating to misappropriation of Battery Management

System software trade secrets.

Law Firm Benesch, Friedlander

Client Vertiv
Status On going
Dates 2019-present

Matter Elastic v. floragunn

Description Investigation related to software copyright infringement of search

software.

Law Firm O'Melveny & Meyers

Client Elastic
Status On going
Dates 2019-present

Matter Lexmark International v Universal Imaging Industries, LLC

Description Investigation related to patent infringement of software and hardware

technologies for laser printing supplies. Testifying expert on matters

related to infringement

Law Firm Banner & Witcocoff

Client Lexmake
Status On going
Dates 2019-present

Matter Gree, Inc v Supercell OY

Description Investigation related to patent infringement of gaming software

technology.

Law Firm Fenwick
Client Supercell
Status On going
Dates 2020-present

Matter Singular Computing LLC v. Google

Description Patent infringement investigation relating to special purpose

computing hardware.

Law Firm Keker Van Nest & Peters

Client Google
Status On going
Dates 2020-present

Matter OnePoint Solutions, LLC et al v MPAY, Inc.

Description Investigation related to software copyright infringement of payroll

software.

Law Firm Morse
Client MPAY
Status On going
Dates 2020-present

Matter Intertrust v Intertrust Defendants (AMC Theatres, Cinemark, and

Regal)

Description Investigation related to patent infringement of software and hardware

of DRM systems.

Law Firm Norton Rose Fulbright

Client Defendants
Status On going
Dates 2020-present

### **Confidential Assignments**

2019-Present Non-testifying litigation consultant for confidential company in

networking industry

Non-testifying litigation consultant for confidential company in

printing industry

2014-2016 Non-testifying litigation consultant for confidential company in

semiconductor packaging industry

Non-testifying litigation consultant for confidential company in EDA software industry

#### **Employment History**

From: 2001 Brass Rat Group, Inc.

To: Current Woodside, CA

Position: *CEO* 

Brass Rat Group is a successful Silicon Valley based consulting organization specializing in litigation consulting and business consulting in the semiconductor (IC) design field. Dr. Walker provided litigation support and expert analysis for plaintiff Synopsys in Synopsys vs Nassda, which was recently settled resulting in a "significant victory" for

Synopsys.

From: 2000 Knowledge Networks

To: 2001 Menlo Park, CA

Position: Chief Technology Officer

Knowledge Networks is a pre-IPO market research company that is leveraging internet technology to revolutionize the market research industry. KN recruited a panel of over 50,000 consumers to be interviewed on a variety of topics weekly. Dr. Walker managed KN's engineering group, which designed and created automated systems to create surveys, conduct interviews, process data, and manage the panel. He also managed the IT group which was responsible for high-

availability web-based systems for fielding the interviews as well as the internal systems required to analyze the data and produce real-time

reports.

From: 1995 Sequence Design (Formerly Frequency Technology)

To: 2000

Position: Founder, Founding CEO, Director & CTO

Sequence Design, formerly Frequency Technology, is the leader in the EDA segment called Design Closure. Sequence's products and services, consisting of pre- and post-layout optimization based on accurate layout extraction, enable designers to bring higher performance, lower-power integrated circuits quickly to tape out. Dr. Walker:

- Developed business plan and raised over \$9MM in financing;
- Hired staff and led development, including defining technical product definition; Personally developed many of the basic algorithms, which resulted in five issued patents;
- Led initial marketing efforts;
- Wrote numerous technical articles advancing the company's technical position;
- Served as chief technical spokesman for the company.

Curriculum Vitae of Martin G. Walker, PhD

From: 1990 **Symmetry Design Systems** 

To: 1995 Los Altos, CA

Position: Founder, Director & Executive Vice President

Symmetry, a self-funding enterprise, was a service and product business specializing in the analog simulation EDA market. Products included simulation-model libraries, modeling tools, and special-purpose analog simulators. Dr Walker was responsible for a joint venture in Beijing China, where new products were developed. Symmetry was acquired by Analogy, Inc.

- Initiated Japanese and European marketing activities.
- Developed conceptual framework and user-interface model for the Sun OpenLook-based product.
- Served as technical spokesman in customer and industry forums.
- Conducted sales training in the US, Asia, and Europe.

From: 1983 **Analog Design Tools** 

To: 1990 Sunnyvale, CA
Position: Founder, Director, Founding CEO & Chief Scientist

ADT's first product, the Analog WorkBench, pioneered the market for Analog CAE workstations, including such fundamental concepts as multiple window CAE systems, and simulated test instruments as a paradigm for CAE user interface. ADT, which had grown to \$16MM in annual sales and 150 employees, was acquired by Cadence.

- Formulated original business plan and presented concept to venture investors. Raised initial venture financing. Led fund-raising activities through the series C round.
- Served as President during formative stage. Director and Chief Scientist (CTO) from the founding through acquisition. Set the product direction. Drove the technology development.
- Formulated ADT's initial marketing strategy. The international distribution strategy focused primarily on Japan.
- Developed the Japanese market for ADT's products. Responsible for establishing and maintaining our distributor relationship, negotiating contracts, supporting customers, and building sales that amounted to 20% of the installed base.

From: 1980 **COMSAT**To: 1983 Palo Alto, CA

Position: Director, Microwave Systems

Curriculum Vitae of Martin G. Walker, PhD Printed: 11/15/20

Managed a Navy sponsored program to develop high productivity techniques for manufacturing of microwave components. Developed a microwave circuit-synthesis product.

From: 1973 Watkins-Johnson To: 1980 Palo Alto, CA

> Position: Member of the Technical Staff

> > Developed GaAsMESFET-based microwave amplifiers, components, and tuners. Designed and produced the world's first GaAsMESFET

amplifiers to be delivered in production quantities.

#### **Consulting History (within last 5 years)**

2005 **Sequence Design** From: 2007 Santa Clara

> EDA software analysis Duties:

From: 2005 Sabio Labs To: 2006 Palo Alto, CA

> Duties: Created business plan, operating plan, and marketing plan for EDA

> > startup focused on analog circuit optimization and synthesis

2005 From: Synopsys, Inc 2012 Mountain View, CA To:

> Technology investigations relating to IP issues. Presented technology Duties:

> > overview to non-technical staff

#### **Patents**

To:

| Patent Number | Date Issued | <u>Title</u>   |  |
|---------------|-------------|--|--|
| 6,643,831     | 2003        | Method and system for extraction of parasitic interconnect   |  |
|               |             | impedance including inductance                               |  |
|               | 2002        | Method and system for extraction of parasitic interconnect   |  |
| 6,381,730     |             | impedance including inductance                               |  |
| 5,901,063     | 1999        | System and method for extracting parasitic impedance from an |  |
|               |             | integrated circuit layout                                    |  |

#### **Education**

| <u>Year</u> | College/University                     | <u>Degree</u>                 |
|-------------|--|-------------------------------|
| 1987        | AEA/Stanford Executive Institute       | Completed w/distinction       |
| 1979        | Stanford University, Stanford, CA      | Ph.D., Electrical Engineering |
| 1976        | Stanford University, Stanford, CA      | MS, Electrical Engineering    |
| 1973        | Massachusetts Institute of Technology, | BS, Electrical Engineering    |
|             | Boston, MA                             |                               |

#### **Publications**

Over fifty articles in the fields circuit design and design automation, including technical papers in peer-reviewed journals, an invited article in the IEEE Spectrum, and various conference proceedings. I have organized seminars, which were designed to enhance the technical credibility of my companies, and written numerous opinion pieces published in journals such as EETimes that served to establish and promote our corporate position. Some more recent publications are listed below.

Martin G. Walker, Modeling the Wiring of Deep Submicron ICs, IEEE Spectrum Vol 37, No. 3, March 01, 2000 at pp. 65-71.

Martin G. Walker, Keh-Jeng (KJ) Chang, Christopher J. Bianchi, SIPP's Why Do We Need a New Standard for Interconnect Process Parameters? VLSI: Systems on a Chip, Kluwer Academic Publishers, December, 1999.

Martin Walker, Timing Errors Haunt Interconnects, Electronic Engineering Times No. 1021, August 17, 1998.

Martin Walker, Interconnect Analysis Must Move to 3-D, Electronic Engineering Times No. 980, November 10, 1997.

Martin G. Walker, The Guardband Crisis, Electronic Engineering Times No. 929 November 25, 1996 at p. 43.

In addition to the foregoing, I also submitted opinion pieces to Integrated Systems Design (May 1997), Electronic Business (April 1998), and EE Times (June, July, and September 1998).

#### **Professional Associations and Achievements**

- 1999 Fortune Magazine "Cool Company" for Frequency Technology.
- 1984 Electronic Products New Product of the Year award for the Analog Workbench
- 1976 IEEE Microwave Applications award recognizing contributions to the design of GaAsFET amplifiers.

Curriculum Vitae of Martin G. Walker, PhD